

EXHIBIT 2

From: Nardone, Susan L. <SNardone@gibbonslaw.com>
Sent: Wednesday, November 8, 2023 12:42 PM
To: Janine Matton <jmatton@mblawfirm.com>
Cc: Steven I. Adler <sadler@mblawfirm.com>; John Burns <JBurns@mblawfirm.com>; Posess, Zachary B. <ZPosess@gibbonslaw.com>
Subject: RE: CC Ford Group and CC Ford Group West, LLC v. Matthew Ornelas-Kuh

Caution: EXTERNAL EMAIL

Thanks Janine. I will review and get back to you on both by the end of the week as requested.

SUSAN L. NARDONE | Director
Employment & Labor Law Group
t: 973-596-4487 | c: 973-464-7629 | f: 973-639-6217
snardone@gibbonslaw.com | [bio](#)

Gibbons P.C. | One Gateway Center | Newark, NJ 07102-5310
m: 973-596-4500 | f: 973-596-0545 | [office](#) | [map](#)



gibbonslaw.com | gibbonslawalert.com 

From: Janine Matton <jmatton@mblawfirm.com>
Sent: Wednesday, November 8, 2023 12:32 PM
To: Nardone, Susan L. <SNardone@gibbonslaw.com>
Cc: Steven I. Adler <sadler@mblawfirm.com>; John Burns <JBurns@mblawfirm.com>; Posess, Zachary B. <ZPosess@gibbonslaw.com>
Subject: RE: CC Ford Group and CC Ford Group West, LLC v. Matthew Ornelas-Kuh

External Email: Use caution with links and attachments.

Hi Susan,

Attached is the subpoena to Mr. Ornelas-Kuh. Kindly advise by noon on Friday, November 10, 2023, whether you will accept service on his behalf.

Also please be advised that if we do not receive a prompt response to our October 17, 2023 letter, our only option will be to bring suit against Mr. Ornelas-Kuh.

Best,
Janine

Janine Matton | Counsel

(973) 295-3651
jmatton@mblawfirm.com

Mandelbaum Barrett PC
3 Becker Farm Road
Roseland, NJ 07068
<https://link.edgепilot.com/s/8811eaa1/8Dzj2xVUJkCsGJ6uD7SF9w?u=http://www.mblawfirm.com/>

New York Office
570 Lexington Avenue, 21st Floor
New York, NY 10022

This email and any attachments are intended solely for the recipient to whom it is addressed. It may also be an attorney-client communication, and as such is privileged and confidential. Any unauthorized review, use, disclosure or copying of this message is strictly prohibited. If you are not the intended recipient or have received this email in error, delete it immediately and notify the sender.

From: Nardone, Susan L. <SNardone@gibbonslaw.com>

Sent: Tuesday, November 7, 2023 12:11 PM

To: Janine Matton <jmatton@mblawfirm.com>

Cc: Steven I. Adler <sadler@mblawfirm.com>; John Burns <JBurns@mblawfirm.com>; Possess, Zachary B. <ZPossess@gibbonslaw.com>

Subject: RE: CC Ford Group and CC Ford Group West, LLC v. Matthew Ornelas-Kuh

Caution: EXTERNAL EMAIL

Hi Janine. Thanks for following up. I am waiting on feedback from my client on the response, which I expect today. If you share the subpoena with me, I will discuss it with my client and get back to you on whether we are authorized to accept service. I am not currently authorized to do so.

Thanks,
Susan

SUSAN L. NARDONE | Director
Employment & Labor Law Group
t: 973-596-4487 | c: 973-464-7629 | f: 973-639-6217
snardone@gibbonslaw.com | [bio](#)

Gibbons P.C. | One Gateway Center | Newark, NJ 07102-5310
m: 973-596-4500 | f: 973-596-0545 | [office](#) | [map](#)



gibbonslaw.com | gibbonslawalert.com 

From: Janine Matton <jmatton@mblawfirm.com>
Sent: Tuesday, November 7, 2023 12:02 PM
To: Nardone, Susan L. <SNardone@gibbonslaw.com>
Cc: Steven I. Adler <sadler@mblawfirm.com>; John Burns <JBurns@mblawfirm.com>; Posess, Zachary B. <ZPosess@gibbonslaw.com>
Subject: RE: CC Ford Group and CC Ford Group West, LLC v. Matthew Ornelas-Kuh

External Email: Use caution with links and attachments.

Good morning, Susan,

We were expecting your reply yesterday, can you please advise when you will be sending it.

Also, please advise whether you will accept service of a subpoena to Mr. Ornelas-Kuh with respect to the CCFW v. Johnson litigation.

Best,
Janine

Janine Matton | Counsel

(973) 295-3651
jmatton@mblawfirm.com

Mandelbaum Barrett PC
3 Becker Farm Road
Roseland, NJ 07068
<https://link.edgepilot.com/s/016f892a/E2y7v1WX6keBz3zlc37WA?u=http://www.mblawfirm.com/>

New York Office
570 Lexington Avenue, 21st Floor
New York, NY 10022

This email and any attachments are intended solely for the recipient to whom it is addressed. It may also be an attorney-client communication, and as such is privileged and confidential. Any unauthorized review, use, disclosure or copying of this message is strictly prohibited. If you are not the intended recipient or have received this email in error, delete it immediately and notify the sender.

From: Nardone, Susan L. <SNardone@gibbonslaw.com>
Sent: Wednesday, November 1, 2023 9:08 AM
To: Janine Matton <jmatton@mblawfirm.com>
Cc: Steven I. Adler <sadler@mblawfirm.com>; John Burns <JBurns@mblawfirm.com>; Posess, Zachary B. <ZPosess@gibbonslaw.com>
Subject: RE: CC Ford Group and CC Ford Group West, LLC v. Matthew Ornelas-Kuh

Caution: EXTERNAL EMAIL

Thank you Janine. We really appreciate it. We do need some more time and will agree that our request for additional time would not be used against your client. I expect to have something to you by Monday the latest. I apologize for the delay.

Susan

SUSAN L. NARDONE | Director
Employment & Labor Law Group
t: 973-596-4487 | c: 973-464-7629 | f: 973-639-6217
snardone@gibbonslaw.com | [bio](#)

Gibbons P.C. | One Gateway Center | Newark, NJ 07102-5310
m: 973-596-4500 | f: 973-596-0545 | [office](#) | [map](#)



gibbonslaw.com | gibbonslawalert.com 

From: Janine Matton <jmatton@mblawfirm.com>
Sent: Thursday, October 26, 2023 6:38 PM
To: Nardone, Susan L. <SNardone@gibbonslaw.com>
Cc: Steven I. Adler <sadler@mblawfirm.com>; John Burns <JBurns@mblawfirm.com>; Posess, Zachary B. <zposess@gibbonslaw.com>
Subject: RE: CC Ford Group and CC Ford Group West, LLC v. Matthew Ornelas-Kuh

External Email: Use caution with links and attachments.

Susan,

We will agree to your request for additional time to respond, as long as you agree that this extension will not be used against our clients should we seek a TRO.

Best,
Janine

Janine Matton | Counsel

(973) 295-3651

jmatton@mblawfirm.com

Mandelbaum Barrett PC

3 Becker Farm Road

Roseland, NJ 07068

<https://link.edgepilot.com/s/ea8c0b80/N6UXeSID2EC6nLwjQxX1Nw?u=http://www.mblawfirm.com/>

New York Office

570 Lexington Avenue, 21st Floor

New York, NY 10022

This email and any attachments are intended solely for the recipient to whom it is addressed. It may also be an attorney-client communication, and as such is privileged and confidential. Any unauthorized review, use, disclosure or copying of this message is strictly prohibited. If you are not the intended recipient or have received this email in error, delete it immediately and notify the sender.

From: Nardone, Susan L. <SNardone@gibbonslaw.com>

Sent: Thursday, October 26, 2023 6:25 PM

To: Janine Matton <jmatton@mblawfirm.com>

Cc: Steven I. Adler <sadler@mblawfirm.com>; John Burns <JBurns@mblawfirm.com>; Posess, Zachary B. <ZPosess@gibbonslaw.com>

Subject: RE: CC Ford Group and CC Ford Group West, LLC v. Matthew Ornelas-Kuh

Caution: EXTERNAL EMAIL

Hi Steve and Janine. I'm sorry to do this but I need a few more days to respond to you. The delay is on my end, not my client's. We had a very large program yesterday that took up a lot of my time and I have a significant brief due tomorrow. I think Tuesday of next week will give us enough time to get this done.

I appreciate your patience.

Thank you,
Susan

SUSAN L. NARDONE | Director

Employment & Labor Law Group

t: 973-596-4487 | c: 973-464-7629 | f: 973-639-6217

snardone@gibbonslaw.com | [bio](#)

Gibbons P.C. | One Gateway Center | Newark, NJ 07102-5310

m: 973-596-4500 | f: 973-596-0545 | [office](#) | [map](#)



gibbonslaw.com | gibbonslawalert.com



From: Nardone, Susan L.

Sent: Thursday, October 19, 2023 3:59 PM

To: Janine Matton <jmatton@mblawfirm.com>

Cc: Steven I. Adler <sadler@mblawfirm.com>; John Burns <JBurns@mblawfirm.com>; Posess, Zachary B. <zposess@gibbonslaw.com>

Subject: RE: CC Ford Group and CC Ford Group West, LLC v. Matthew Ornelas-Kuh

Hi Steve and Janine. We acknowledge receipt of your letter and we are working with our client to prepare a response. I see that you requested a response by Monday but ask that you give us until the end of next week to do so. If you have an objection to that timeline, please let me know.

Thank you,
Susan

SUSAN L. NARDONE | Director
Employment & Labor Law Group
t: 973-596-4487 | c: 973-464-7629 | f: 973-639-6217
snardone@gibbonslaw.com | [bio](#)

Gibbons P.C. | One Gateway Center | Newark, NJ 07102-5310
m: 973-596-4500 | f: 973-596-0545 | [office](#) | [map](#)



gibbonslaw.com | gibbonslawalert.com 

From: Janine Matton <jmatton@mblawfirm.com>
Sent: Tuesday, October 17, 2023 1:54 PM
To: Nardone, Susan L. <SNardone@gibbonslaw.com>
Cc: Steven I. Adler <sadler@mblawfirm.com>; John Burns <JBurns@mblawfirm.com>
Subject: CC Ford Group and CC Ford Group West, LLC v. Matthew Ornelas-Kuh

Good afternoon, Ms. Nardone,

Enclosed please find correspondence in this matter.

Best,
Janine

Janine Matton | Counsel

(973) 295-3651
jmatton@mblawfirm.com

Mandelbaum Barrett PC
3 Becker Farm Road
Roseland, NJ 07068
<https://link.edgепilot.com/s/4549bcf0/jVnVzXwHtkWRcb22u03axw?u=http://www.mblawfirm.com/>

New York Office
570 Lexington Avenue, 21st Floor
New York, NY 10022

This email and any attachments are intended solely for the recipient to whom it is addressed. It may also be an attorney-client communication, and as such is privileged and confidential. Any unauthorized review, use, disclosure or copying of this message is strictly prohibited. If you are not the intended recipient or have received this email in error, delete it immediately and notify the sender.

Disclaimer

The contents of this message, together with any attachments, may contain information that is legally privileged, confidential and exempt from disclosure. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, printing, or copying of this message, or any attachment, is strictly prohibited. If you have received this message in error, please do not read this message or any attachments and please notify me immediately by reply e-mail or call Gibbons P.C. at 973-596-4500 and delete this message, along with any attachments, from your computer.

Links contained in this email have been replaced for YOUR security. If you click on a link in the email above, the link will be analyzed for known threats.

Links contained in this email have been replaced for YOUR security. If you click on a link in the email above, the link will be analyzed for known threats.

Links contained in this email have been replaced for YOUR security. If you click on a link in the email above, the link will be analyzed for known threats.

Links contained in this email have been replaced for YOUR security. If you click on a link in the email above, the link will be analyzed for known threats.